

Docket Management Facility
(USCG-2005-22837)
U.S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20590-0001

Dear Sir/Madam:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the Environmental Protection Agency (EPA) has reviewed U. S. Coast Guard's (USCG) draft programmatic Environmental Impact Statement (EIS) for Implementation of the U.S. Coast Guard Nationwide Automatic Identification System (NAIS) Project. (CEQ # 20060271).

The purpose of this project is to establish a nationwide network of receivers and transmitters to capture, display, exchange, and analyze automatic identification system (AIS) generated information. This would satisfy the USCG's need to enhance homeland security while carrying out its mission to ensure marine safety and security, preserve maritime mobility, protect the marine environment, enforce U.S. laws and international treaties, and perform search and rescue operations. The proposed action involves installing receivers, transmitters, transceivers, repeaters, and other equipment on towers or other structures at up to 450 sites along 95,000 miles of coastline, other inland waterways, and remote platforms such as satellites, offshore oil and gas platforms and data buoys. The proposed project would provide detection and identification of vessels carrying AIS equipment approaching or operating in the maritime domain where little or no vessel tracking currently exists.

The technical and operational requirements for NAIS require the system to be operational in both inland navigable waters and the open ocean out to 2,000 nautical miles offshore. For this reason, in order to meet the proposed action, USCG has determined that a combination of implementation alternatives would be necessary to meet these requirements. They include:

- (1) establishing a combination of co-located and newly built shore-based radio frequency sites for short-range AIS coverage;

- (2) leasing commercial satellite services for long-range AIS coverage; and
- (3) installing AIS equipment on existing offshore oil and gas platforms and data buoys for supplemental coverage.

The document states that the actions to lease commercial satellite services for long-range AIS coverage and installing AIS equipment on existing offshore oil and gas platforms and data buoys for supplemental long-range coverage would likely be categorically excluded from detailed NEPA analysis by using an established categorical exclusion (CATEX). While EPA does not object to this approach, it does not appear that the stated CATEX applies to these actions. During further communications with the USCG, staff indicated that they recognized this was incorrect. This will be corrected in the final EIS.

Based on the review of the document and the clarification provided above, we have rated the document as Lack of objectives (LO).

We appreciate the opportunity to review and comment on this draft programmatic EIS. We also look forward to reviewing the final programmatic EIS related to this project. The staff contact for the review is Marthea Rountree and she can be reached at 202-564-7141.

Sincerely,

Anne Norton Miller
Director
Office of Federal Activities